

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ANDREW SAMUELS, on behalf of himself and  
all others similarly situated

Plaintiff,

v.

LIDO DAO; AH CAPITAL MANAGEMENT,  
LLC; PARADIGM OPERATIONS LP;  
DRAGONFLY DIGITAL MANAGEMENT  
LLC; ROBOT VENTURES LP,

Defendants.

Case No. 3:23-cv-06492-VC

**JOINT STIPULATION REGARDING  
CASE SCHEDULE**

Pursuant to the Court's Minute Entry following the January 10, 2025 Initial Case Management Conference, (ECF 149), Plaintiff Andrew Samuels and Defendants AH Capital Management LLC, Dragonfly Digital Management LLC, and Paradigm Operations LP (collectively, the "Parties") hereby jointly propose the following case schedule<sup>1</sup>:

Event	Parties' Proposed Date/Deadline
Initial Disclosures	January 24, 2025
Substantial Completion of Document Production	July 1, 2025
Class Certification Motion	September 29, 2025
Opposition to Class Certification	November 10, 2025
Reply in Support of Class Certification	December 22, 2025
Deadline to Amend Pleadings to add Parties or Claims pursuant to FRCP 15(a)(2)	January 16, 2026
Close of Fact Discovery	February 26, 2026
Deadline to Serve Discovery-Related Motions re: Fact Discovery	March 19, 2026
Opening Expert Reports	March 17, 2026
Rebuttal Expert Report	April 16, 2026
Close of Expert Discovery	May 15, 2026
Deadline to Serve Discovery-Related Motions re: Expert Discovery	June 9, 2026
Summary Judgment Motions	August 6, 2026
Summary Judgement Oppositions	September 24, 2026
Summary Judgement Replies	October 29, 2026
Dispositive Motion Hearing	November 19, 2026
Final Pretrial Conference	February 4, 2027
Trial	March 8, 2027

Respectfully submitted,

Dated: January 17, 2025

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<sup>1</sup> The Defendants reserve their rights to seek to modify the schedule based on events that may occur in the action, including if the Court grants Defendants' pending motion to certify an interlocutory appeal under 28 U.S.C. § 1292(b).

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**FILERS ATTESTATION**

I, Alexander C. Drylewski, am the ECF User whose ID and password are being used to file this Joint Stipulation Regarding Case Schedule. In compliance with Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document have been obtained from each of the other signatories.

By: Alexander C. Drylewski  
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